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18 UNITED STATES DISTRICT COURT  
19 FOR THE  
20 NORTHERN DISTRICT OF CALIFORNIA

21 RICARDO TAVARES, JOEL RODRIGUEZ

22 Case No.: C08-1277 HRL

23 Plaintiffs,

24 vs.  
25 **STIPULATION TO CONTINUE THE  
INITIAL CASE MANAGEMENT CASE  
CONFERENCE & [PROPOSED] ORDER**

26 DURAN HOGAN CONSTRUCTION, KURT  
27 ROBERT HOGAN SR., RAMON DURAN  
28 JR., SYLVIA GARCIA HOGAN, MARIA  
29 ELENA HOGAN AND DOES 1-10

30 Defendants

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32 Parties through their counsel stipulate to continue the Initial Case Management Conference  
33 currently scheduled for June 24, 2008 as follows:

34 1. Plaintiffs filed Plaintiffs their Complaint on March 5, 2008.  
35 2. The process was served on Defendants on May 2, 2008.

3. Thereafter, Plaintiffs' counsel have been contacted by Defendants counsel Mr. Paul Simpson who pointed out certain errors in the Complaint that require the amendment of the Complaint.
4. On June 9, 2008, Plaintiff filed their First Amended Complaint ("FAC") of course. On the same day, the FAC was served on Mr. Simpson via e-mail. Mr. Simpson acknowledged the service via e-mail, but stated that Defendants' responsive pleading is not due until June 30, 2008.
5. Therefore, parties respectfully request that the Initial Case Management Conference be currently scheduled for June 24, 2008 be continued to July 8, 2008.

Dated: June 23, 2008

By: /s/ Adam Wang  
Adam Wang  
Attorney for Plaintiffs

Dated: June 23, 2008

By: /s/ Paul Simpson.  
Paul Simpson  
Attorney for Defendants

## [PROPOSED] ORDER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the Initial Case Management Conference be continued to July 8, 2008, at 1:30 PM.

Dated: June \_\_\_, 2008

By: \_\_\_\_\_